

CALFRESH (CF) PROGRAM REQUEST FOR POLICY/REGULATION INTERPRETATION

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Be sure to identify the additional discussion with the appropriate number and heading. Retain a copy of the CF 24 for your records.

- Questions from counties, including county Quality Control, must be submitted by the county CalFresh Coordinator and may be submitted directly to the CalFresh Policy analyst assigned responsibility for the county, with a copy directed to the appropriate CalFresh Policy unit manager.
- Questions from Administrative Law Judges may be submitted directly to the CalFresh Policy analyst assigned responsibility to the county where the hearing took place, with a copy of the form directed to the appropriate CalFresh Bureau unit manager.

1. RESPONSE NEEDED DUE TO:		5. DATE OF REQUEST: 11/17/15	NEED RESPONSE BY: ASAP
<input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input type="checkbox"/> Other:		6. COUNTY/ORGANIZATION: Los Angeles	
2. REQUESTOR NAME:		7. SUBJECT: CalFresh Employment & Training Claiming	
3. PHONE NO.:		8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references) NOTE: All requests must have a regulation cite(s) and/or a reference(s). All County Information Notice I-50-07	
4. REGULATION CITE(S): 63-407.8			
9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):			

In Los Angeles County (LAC) we offer E&T services to two populations in our E&T Plan. Those who are receiving CalFresh (CF)/General Relief (GR) participating in our GROW Program and Non-Assistance CF participants participating in workfare.

When there are situations where GR participants participating in GROW activities do not comply with a GR requirement, without good cause, his/her GR case will be terminated at the end of the month (e.g., 8/31/15). However, as a policy here in LAC, before the termination action is final, the GR participant has until the 3rd Thursday of the following month (e.g., 9/17/15 which is the 3rd Thursday after 8/31/15) to comply with the GR requirement at a Compliance Appointment. If he/she attends the compliance appointment and complies with the GR requirement, then the GR termination action will be rescinded and GR cash aid restored back to 9/1/15 (e.g., no break in GR benefits). If he/she does not attend the appointment, then the GR case will remain terminated and no GR benefits will be issued after 8/31/15. **Note in these case situations the CF case will remain active. Also, in the case scenarios below, all the CalFresh cases remained opened.**

Case Scenario 1: A GR/CF participant participating in GROW GR case was terminated 8/31/15 due to failure to comply with a GR requirement. The participant is still receiving CF and continued to go to Job Club from 9/1/15 – 9/16/15, although his GR case was terminated 8/31/15. The participant had previously been issued transportation monies on 8/14/15 to attend the Job Club activity on 9/1/15. The participant continued to go to Job Club with the intention to attend the Compliance Appointment on 9/17/15 (Per LAC Policy) to cure his GR termination. The participant attends the compliance appointment on 9/17/15 and cures the GR termination. His GR benefits were restored back to 9/1/15.

Q: Is the Job Club services and transportation costs claimable to E&T, since the participant is actively receiving CF and participated in a GROW activity, although technically at the time he attended the GROW activity (e.g., 9/1/15 – 9/16/15) he was not receiving GR? Per LAC policy, it allowed this participant until 9/17/15 to attend a compliance appointment to cure his GR termination before the GR termination action is final. The participant subsequently attended the Compliance Appointment on 9/17/15 and cured his GR termination. His GR benefits were restored back to 9/1/15 without a break in GR aid.

State Policy Response:

Yes. Costs associated with the provision of job club services and participant reimbursements may be claimed to E&T as the individual continued to receive CalFresh and actively participated in job club.

Case Scenario 2: Same as Case Scenario 1 above, except for the participant did not attend the Compliance Appointment on 9/17/15; and therefore, the GR case remained terminated effective 8/31/15.

Q: *Is the Job Club services and transportation costs claimable to E&T, since the participant is actively receiving CF and participated in the GROW activity during the period 9/1/15 – 9/16/15? Per LAC policy, it allowed this participant until 9/17/15 to attend a compliance appointment to cure his GR termination before the GR termination action is final. The participant did not attend the Compliance Appointment on 9/17/15 to cure his GR termination. Therefore, his GR benefits remained terminated.*

State Policy Response:

Yes. If the individual actively participated in job club prior to the compliance appointment, expenditures directly linked to job club may be claimed to E&T. Costs may not be claimed effective September 17 since the individual failed to attend the 9/17 compliance appointment and his/her job club component ends.

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Case Scenario 3: Same as Case Scenario 1 above, except for the GROW Case Manager did not issue the transportation monies to the participant. The participant paid for the transportation cost out-of-pocket on 9/1/15 to attend Job Club on 9/1/15 – 9/16/15.

Q: *Is the Job Club services and transportation costs claimable to E&T, since the participant is actively receiving CF and participated in a GROW activity, although technically at the time he attended the GROW activity (e.g., 9/1/15 – 9/16/15) he was not receiving GR? Per LAC policy, it allowed this participant until 9/17/15 to attend a compliance appointment to cure his GR termination before the GR termination action is final. The participant subsequently attended the Compliance Appointment on 9/17/15 and cured his GR termination. His GR benefits were restored back to 9/1/15 without a break in GR aid. He was reimbursed for the out-of-pocket transportation cost for attending Job Club.*

State Policy Response:

Yes. Administrative costs associated with the provision of job club services as well as participant reimbursements may be claimed to E&T provided the individual received all job club services and standard participant reimbursements granted to other active E&T job club participants. Costs may not be claimed effective September 17 since the individual failed to attend the 9/17 compliance appointment and his/her job club component ends.

Case Scenario 4: Same as Case Scenario 2 above, except for the Eligibility Worker did not issue the transportation monies to the participant. The participant paid for the transportation cost out-of-pocket on 9/1/15 to attend Job Club on 9/1/15 – 9/16/15.

Q: *Is the Job Club services and transportation costs claimable to E&T, since the participant is actively receiving CF and participated in the GROW activity during the period 9/1/15 – 9/16/15? Per LAC policy, it allowed this participant until 9/17/15 to attend a compliance appointment to cure his GR termination before the GR termination action is final. The participant did not attend the Compliance Appointment on 9/17/15 to cure his GR termination. Therefore, his GR benefits remained terminated. He was reimbursed for the out-of-pocket transportation cost for attending Job Club.*

State Policy Response:

Yes. Administrative costs associated with the provision of job club services as well as participant reimbursements may be claimed to E&T provided the individual received all job club services and standard participant reimbursements granted to other active E&T job club participants.

10. REQUESTOR'S PROPOSED ANSWER:

In all 4 case scenarios, the county is eligible to claim E&T costs for the E&T GROW activity and reimbursement for transportation costs to attend the E&T GROW activity.

11. STATE POLICY RESPONSE (CFPB USE ONLY):

FOR CDSS**USE**

DATE RECEIVED:

11/17/15

DATE RESPONDED TO COUNTY/ALJ:

12/22/15 RN